



DESERT WHALE

JOJOBA COMPANY

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August 12, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Avenue, SW
Room 4008 – So., Ag Stop 0268
Washington, DC 202050
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Docket: **TM-04-07**

RE: TM-04-07 National Organic Program, Sunset Review

Dear Mr. Neal:

We are in support of the request by FEMA and the Food Additives Council to extend the comment period by 60 days concerning “National Organic Program, Sunset Review” 70 Fed Reg. 35177 (June 17, 2005) as we believe many of the companies concerned are not aware this review is taking place. Moreover, more than 30 days is required to gather the supporting documentation. Thank you for considering this request.

We also support Mr. Knudsen’s opinion that modification of the National List ‘...only be done by the continued review and additions or deletions by the NOSB’.

Without many of the ingredients listed on National List, we would not be able to process and offer for sale certified organic products.

Desert Whale Jojoba Company supports the continued allowance of the following substances, as all are essential to the processing of organic jojoba oil:

Name of Substance	Location on National List	Reason for continued allowance	Supporting Documents
Acids (Alginic; Citric – produced by microbial fermentation of carbohydrate substance; and Lactic)	205.605	Incorporated in the production of Sorbsil R92 and used as a degumming agent.	
Bentonite	205.605	Used as bleaching agent. No other bleaching ingredient approved for organic use.	



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Name of Substance	Location on National List	Reason for continued allowance	Supporting Documents
Diatomaceous earth – filtering aid	205.605	Filtering agent	
Nitrogen – oil free grades	205.605	Used in storage to preserve material, prolonging shelf life, preventing spoilage	
Silicon dioxide	205.605	Incorporated in the production of Sorbsil R92 and used as a degumming agent.	

Regards,

Kurt Schwamberger
Quality Assurance Manager
Desert Whale Jojoba Company, Inc.

Juli Teeters
Executive Assistant
Desert Whale Jojoba Company, Inc.